

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS

ROBERT L. RICHARDSON,  
Plaintiff,

v.

KEOLIS COMMUTER SERVICES, LLC,  
Defendant and  
Third-Party Plaintiff,

v.

LAZ PARKING LIMITED, LLC and  
CRAIG L. GREEN, d.b.a. GREEN N'  
GROWING LANDSCAPING,  
Third-Party Defendants.

CASE NUMBER: 1:17-cv-10912-PBS

JOINT LIST OF WITNESSES

The parties submit this *Joint List of Witnesses* for the trial on  
November 18, 2019, at 9 a.m.:

1. Keolis Commuter Services, LLC intends to call the following witnesses  
at trial

A. Robert L. Richardson, 93 Franklin Street, Apt. 2, Quincy,  
Massachusetts

Anticipated direct examination: 2 to 4 hours

Anticipated cross-examination: thirty minutes to one hour.

B. David Greeley, 21 Third Street, Weymouth, Massachusetts

Anticipated direct examination: 2 hours

Anticipated cross-examination: thirty minutes to one hour.

C. Craig L. Green, 30 Perley Avenue, Peabody, Massachusetts

Anticipated direct examination: 2 hours

Anticipated cross-examination: 2 hours

D. Jamie Dupes, 3A Hemlock Street, Plaistow, New Hampshire

Anticipated direct examination: .5 to 1 hour

Anticipated cross-examination: thirty minutes to 1 hour.

- E. Dale McGuire, 19 Winthrop Street, Rehoboth, Massachusetts  
Anticipated direct examination: .5 to 1 hour  
Anticipated cross-examination: thirty minutes to 1 hour.
- F. Sean P. Woodbine, 24 Greenpost Lane, Warwick, Rhode Island  
Anticipated direct examination: 1 hour  
Anticipated cross-examination: thirty minutes to 1 hour.
- G. Michelle Milot, c/o Keolis Commuter Services, LLC  
Anticipated direct examination: 1 hour  
Anticipated cross-examination: thirty minutes

Keolis Commuter Services, LLC reserves the right to amend or supplement its list of witnesses; as well as to amend or add to its list of witnesses up and through trial, to call any witness identified by either third-party defendant, and to call any witness, whether or not identified above, in rebuttal as may be necessary at trial.

2. LAZ Parking Limited, LTD intends to call the following witnesses at trial:

- A. Sean P. Woodbine, 24 Greenpost Lane, Warwick, Rhode Island  
Anticipated direct examination: 1 hour  
Anticipated cross-examination: 1 hour
- B. George W. Melchior, R.A., P.E., LEED AP, 1061 South Street  
Portsmouth, NH 03801  
Anticipated direct examination: 1 hour;  
Anticipated cross-examination: 1 hour

Any individual or entity who has been identified during the course of discovery, but who have inadvertently not been listed, may be called to testify consistent with their pre-trial disclosure.

LAZ reserves the right to call any witnesses identified by Keolis and/or Green 'N Growing and to supplement this list of witnesses with adequate pre-trial notice.

LAZ also reserves the right to call rebuttal witnesses and reserves the right to seasonably supplement this section of the Joint Witness List.

Further, LAZ reserves the right to call any other witness whose identity becomes known to the parties prior to trial or who becomes necessary as the result of further discovery or information obtained by the parties.

LAZ reserves the right to call any witnesses listed by Keolis and/or Green 'N Growing and to supplement this list seasonably and prior to the trial of this matter.

3. The third-party Defendant Craig L. Green, d.b.a Green N' Growing Landscaping, intends to call the following witnesses:

- A. Peter Furtado; 38 Dona Road, Revere, Massachusetts  
Anticipated direct examination: 30-45 minutes  
Anticipated cross-examination: 1 hour
- B. Keeper of Records of the Massachusetts Governor's Office;  
Massachusetts State House, Boston, Massachusetts  
Anticipated direct examination: 10 minutes  
Anticipated cross-examination: 10 minutes

The third-party defendant reserves his right to call all witnesses identified by the plaintiff, to call rebuttal witnesses, and to seasonably supplement this list prior to trial.

Respectfully submitted,

KEOLIS COMMUTER SERVICES, LLC,  
by its attorney,

LAZ Parking Limited, LLC,  
by his attorney,

/s/ Richard A. Davidson, Jr.  
Richard A. Davidson, Jr. BBO# 552988  
DAVIDSON LAW OFFICE  
110 The Great Road, 2<sup>nd</sup> Floor  
Bedford, Massachusetts 01730  
(781) 275-0222  
davidson@rdavidson.net

/s/ Lawrence H. Behrens  
Lawrence H. Behrens, Esq. BBO# 662171  
Law Office of Thomas M. Franco  
99 High Street, 25<sup>th</sup> Floor  
Boston, Massachusetts 02110  
(617) 235-7955  
Lawrence.Behrens@aig.com

CRAIG L. GREEN, d.b.a. GREEN N' GROWING LANDSCAPING,  
by his attorney,

/s/ James M. McLaughlin  
James M. McLaughlin, Esq.  
Hassett & Donnelly, P.C.  
446 Main Street, 12th Floor  
Worcester, Massachusetts 01608  
(508) 791-6287  
*jmclaughlin@hassettanddonnelly.com*

Dated: November 7, 2019

CERTIFICATE OF SERVICES

I, Richard A. Davidson, Jr., hereby certify that a true and accurate copy of the Joint List of Witnesses was sent electronically through the ECF system and by 1<sup>st</sup> Class United States Mail, postage prepaid, to Lawrence H. Behrens, Esq., Law Office of Thomas M. Franco, 99 High Street, 25th Floor Boston, Massachusetts 02110 and James M. McLaughlin, Esq., Hassett & Donnelly, P.C., 446 Main Street, 12th Floor, Worcester, Massachusetts 01608.

Signed under the pains and penalties of perjury this 7<sup>th</sup> day of November, 2019.

/s/ Richard A. Davidson, Jr.  
Richard A. Davidson, Jr. BBO# 552988